

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA <i>ex rel.</i>)	
JEFFREY H. LIEBMAN and DAVID M.)	
STERN, M.D.,)	Case No.: 3:17-cv-00902
)	
Plaintiff-Relators,)	JUDGE CAMPBELL
)	MAGISTRATE JUDGE HOLMES
v.)	
)	
METHODIST LE BONHEUR HEALTHCARE)	
and METHODIST HEALTHCARE-MEMPHIS)	
HOSPITALS,)	
)	
Defendants.)	
_____)	

DECLARATION OF STEPHANIE RICHEY

I, Stephanie Richey, declare under penalty of perjury that the following statements are true and correct:

1. I am employed as a contractor civil health care investigator for the United States Attorney's Office in the Middle District of Tennessee. I have worked here since August 2022.

2. In April 2023, I created a summary spreadsheet (or a summary chart) showing the Medicare enrollment dates for providers from the West Clinic.

3. To create this list, I used an Enrollment Record Data Report, which bears the bates numbers GOV000552-GOV000653. This report is 102 pages and is so voluminous that it cannot be conveniently examined in court.

4. The United States produced this report to Methodist on August 15, 2022. *See Ex. 1* (Sweet email to Methodist counsel of 8/15/22).

5. Using the above report, I prepared a summary spreadsheet, which is called "West Clinic – Enrollment Dates.xlsx" and is attached to this declaration. *See Ex. 2*. This summary spreadsheet accurately summarizes three fields of information from the Enrollment Data Report.

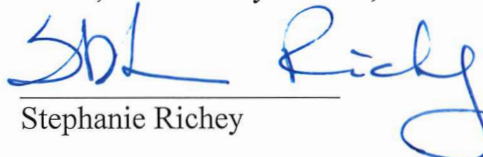
Specifically, my spreadsheet summarized the Provider National Provider Identification Number (“NPI”), the West Provider Name, and the Enrollment Dates for each such provider. The enrollment date range listed there specifically includes the first date of their Medicare enrollment as a West Clinic provider through their last date (if any) of such enrollment as a West Clinic provider. The spreadsheet I prepared is an accurate of these three fields from the Enrollment Data Report.

6. At my request, on June 8, 2023, I obtained from SafeGuard Services, LLC a newly updated/ more current Enrollment Record Summary and a certification that the summary is a business record of Safeguard Services. The certification bears the bates number GOV004998, and the Enrollment Record Summary bears the bates numbers GOV004999-GOV005118. It is 120 pages in length and is so voluminous that it cannot be conveniently examined in court. Having examined this report, I can see that it has a slightly longer page length than the earlier version of this report, because it goes through the present day.

7. On June 15, 2023, I understand that the United States will produce this updated Enrollment Record Summary to Methodist as part of the United States’ Fifth Supplemental Initial Disclosures. *See* Ex. 3 (Fifth Suppl. Initial Discl.). Aside from the longer date range, the two enrollment record files contain the same information.

8. I have compared my summary spreadsheet – “West Clinic – Enrollment Dates.xlsx” – against the updated Enrollment Summary with bates numbers GOV004999-GOV005118. I verified that my summary spreadsheet is an accurate summary of this updated Enrollment Summary.

Dated, this 15th day of June, 2023


Stephanie Richey

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, a true and correct copy of the foregoing was served via email to the following:

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s/ Ellen Bowden McIntyre
ELLEN BOWDEN MCINTYRE
Assistant United States Attorney